

Exhibit 23

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
3 AUSTIN DIVISION
4

5 KATHY CLARK, AMY ENDSLEY, SUSAN
6 GRIMMETT, MARGUERIETTE SCHMOLL,
7 and KEVIN ULRICH, on behalf of
8 themselves and all others

9 Similarly situated,

10

11 Plaintiffs,

12

13 vs.

No. 1:12-CV-00174-SS

14

15 CENTENE CORPORATION, CENTENE

16 COMPANY OF TEXAS, L.P., and

17 SUPERIOR HEALTHPLAN, INC.,

18

19 Defendants.

20 DEPOSITION OF TRICIA DINKELMAN,
21 taken on behalf of the Plaintiffs, at the offices of
22 Armstrong Teasdale L.L.P., 7700 Forsyth Boulevard,
23 Suite 1800, St. Louis, Missouri, on the 24th day of
24 October, 2012, before Gretta G. Cairatti, RPR, CRR,
25 MO-CCR #790, IL-CSR #084-003418, and Notary Public.

1 part of my job responsibility.

2 **Q** Okay. So it's your testimony that a
3 representative of Centene Corporation would not have
4 that information.

5 **A** That's correct.

6 **Q** Let me show you a document that's entitled,
7 Defendants Second Supplemental Objections and
8 Answers to Plaintiffs First Set of Interrogatories
9 to Defendant Centene Corporation.

10 **MR. LANGENFELD:** In fact, let's go ahead and
11 mark that.

12 (Plaintiff's Exhibit No. 5 marked for
13 identification.)

14 **QUESTIONS BY MR. LANGENFELD:**

15 **Q** Interrogatory number 1, go ahead and read
16 that to yourself, please.

17 **MR. KAISER:** I assume you don't have extra
18 copies?

19 **MR. LANGENFELD:** I don't. I didn't, quite
20 frankly, anticipate this happening.

21 **MR. KAISER:** So if you don't mind, I'll just
22 look over your shoulder. Interrogatory number 1?

23 **QUESTIONS BY MR. LANGENFELD:**

24 **Q** Interrogatory number 1 generally asks to
25 I -- describe the job duties and to identify what

1 you consider to be the primary duty for those
2 positions; correct?

3 **A** Mm-mm.

4 **Q** Is that a yes?

5 **A** Yes.

6 **Q** And as a Centene corporate rep, you don't
7 have that information?

8 **A** As a Centene corporate rep, no, I would not
9 have that information.

10 **Q** Interrogatory number 5, go ahead and read
11 interrogatory number 5.

12 May I have it back, please? Is it your
13 testimony that as a Centene corporate
14 representative, you wouldn't have that information
15 either?

16 **A** As a Centene corporate representative, that
17 information would not be known, other than it was
18 listed on the interrogatory that information was
19 obtained from the Human Resources Department.

20 **Q** Do you see that that interrogatory was
21 answered with the list of subsidiaries?

22 **A** Yes.

23 **Q** In fact, I'll represent to you that there
24 are 43 of them that were identified in response to
25 interrogatory number 5; okay?

1 **A** Okay.

2 **Q** And then in addition, later, somebody caught
3 a mistake, or gained some additional information,
4 and went ahead and listed another one, NovaSystem
5 Health, Inc. Do you see that?

6 **A** Mm-mm, yes.

7 **Q** Is all of this information that would be
8 within the knowledge of the Centene corporate rep?

9 **A** The Centene Corporation would not have
10 knowledge of that, but the information was obtained
11 from Centene Management Company's Human Resources
12 Department.

13 **Q** And did -- these interrogatories were sworn
14 to, and in fact, weren't they sworn to by you?

15 **A** That's correct. And I validated that
16 information with the Human Resources Department.

17 **Q** So you were able to obtain that information.
18 You wouldn't have signed a verification stating it's
19 true if you hadn't obtained information that it is
20 accurate, would you?

21 **A** Correct.

22 **Q** Is there any reason why you're able to
23 obtain that level of information to answer that
24 interrogatory but you weren't able to obtain any of
25 the information I've asked you about when we went

1 through the -- the areas of inquiry for your
2 deposition today?

3 **A** The interrogatories -- or the deposition
4 sections were discussing Centene Corporation's
5 knowledge of that information.

6 **Q** Well, look at -- look through those
7 interrogatories that were sent. Who were they sent
8 to?

9 **A** They were sent to Centene Corporation.

10 **Q** Correct. So let me ask the same question.
11 Is there any reason why you were able to obtain the
12 information to answer interrogatory number 5 but not
13 to answer the areas of inquiry for your deposition
14 today?

15 **A** It would have taken an extensive amount of
16 time for me to figure out who at each subsidiary had
17 the answers to each one of your questions.

18 **Q** And so what efforts --

19 **A** And --

20 **Q** I'm sorry, go ahead.

21 **A** -- so I spoke to individuals about what
22 Centene Corporation would know about these items. I
23 did not go to the subsidiaries.

24 **MR. LANGENFELD:** Okay. I tell you what I'm
25 going to do, is I don't want to end the deposition